

LAW OFFICE OF DAVID R. LURIE, PLLC

*194 President Street
Brooklyn, New York 11231*

*Phone: 347-651-0194
E-mail: david@davidlurielaw.com*

August 23, 2022

Via ECF

The Honorable Victor Marrero
United States District Judge
United States District Court for the Southern District of New York
500 Pearl Street, Suite 1040
New York, New York 10007

Re: Rohan Ramchandani v. Citigroup, Inc., et al.,
Civil Action No. 1:19-cv-9124 (VM) (SDA)

Dear Judge Marrero:

We write, on behalf of our client, Plaintiff Rohan Ramchandani, pursuant to this Court's Order of August 17, 2022 to address the pre-dispositive motion letter schedule:

First, Plaintiff does not contemplate making a pre-trial dispositive motion.

Second, by letter dated August 23, 2022 (ECF #126), Defendants stated their intention to move for summary judgment, and proposed to file their pre-motion letter by September 14, 2022, 22 days from today.

We respectfully request that Plaintiff be afforded an equivalent period of time within which to respond to Defendants' letter, and thus that our responsive letter be due on October 6, 2022.

Thank you for the Court's consideration.

Respectfully submitted,

/s/

David R. Lurie

cc: All Counsel (via ECF)